

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

JOESEPH R. BIDEN, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**DECLARATION OF LIGA CHIA IN
SUPPORT OF PLAINTIFFS' REPLY
MEMORANDUM IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT
AND IN OPPOSITION TO
DEFENDANTS' CROSS-MOTION FOR
SUMMARY JUDGMENT**

**FILED UNDER SEAL:
EXHIBIT A**

I, Liga Chia, hereby declare:

1. I have personal knowledge of the facts stated below and am competent to testify regarding the same. I am one of the attorneys for Plaintiffs in this matter, *Wagafe v. Biden*, No. 17-cv-00094 RAJ.

2. Attached as **Exhibit A** is a true and correct copy of Lesson Two slides in USCIS's "Cultural Awareness" training.

3. I have reviewed USCIS's web-based "Cultural Awareness" training. Defendants produced the training to Plaintiffs in its native format electronically. The training is focused on issues to be mindful of when interviewing applicants from different countries. The training provides definitions for "culture" as a general concept and related terminology.

4. In Lesson Two, the training explores the distinction between two types of cultures: “high-context” and “low-context” cultures. Exh. A, p. 3. It refers to high-context cultures, also identified as “shame-based cultures,” as commonly found in many Asian, Middle Eastern, and African countries. Exh. A, p. 5. The training describes these cultures as being driven by societal and familial shame, where “the avoidance of losing one’s reputation or being shamed is very important.” *Id.* When grappling with moral dilemmas, the training illustrates that when an individual from a shame-based culture believes they themselves are guilty of something but nobody else knows of their guilt, their internal response is not that they should still feel guilty but rather that because no one else is aware of their guilt they are not shamed. *See* Exh. A, p. 9. The training states that for individuals who are part of these cultures, “honor is more important than facts. When confronted or threatened, [they] simply reinterpret the facts to suit [their] needs.” Exh. A, p. 10. In these cultures, “relationships rather than logic can be persuasive” and individuals believe that “rules are not absolute and should change based on relationships.” *Id.* For these individuals “time is in abundance. It is not necessary to do everything in the here and now.” *Id.*

5. In contrast, the training states that low-context cultures are “rule-based” and “guilt-based.” Exh. A, p. 7. They include American, Canadian, Australian, German, and British cultures as low-context cultures. *Id.* For individuals from these cultures, “being objective is being truthful and fair.” Exh. A, p. 10. Personal guilt serves as the moral compass. Exh. A, p. 7. The training states that these individuals espouse the belief that “[r]ules should not be broken to provide special treatment to any individual.” *See* Exh. A, p. 10. It further states that these individuals can be persuaded by logic and appreciate that time is precious and limited. Exh. A, p. 10.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 11th day of June, 2021, in Los Angeles, CA.

/s/ Liga Chia
Liga Chia, *pro hac vice*

EXHIBIT A

FILED UNDER SEAL



High-Context and Low-Context Cultures Lesson 2



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Lesson Objective

By the end of this lesson, you will be able to:

- State the difference between high-context and low-context cultures



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High-Context and Low-Context Cultures

There are over 5,000 cultures in the world. Each has its own logic and set of rules both explicit and implicit.

According to Edward Hall (1976), one method for understanding cultural differences is to first look at a broad classification that divides cultures into two categories:

- High-context cultures
- Low-context cultures

High-context cultures may also be referred to as shame-based cultures and low-context cultures are referred to as guilt-based cultures. (F.R. Dodds, 1951)



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High-Context Cultures

A high-context culture is one in which the members of the society or group have close connections over an extended period of time. Many aspects of their behavior may not be made explicit because individuals know what to do based on years of interaction with one another. Information about what to do is implicit.

Think of your immediate family as a high-context culture. Other examples would be a small religious congregation or a party with very close friends.



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High-Context Culture (continued)

High-context cultures are heavily relationship-based. Outsiders may have a difficult time being accepted because they have not established the appropriate relationships.

Because these cultures are so relationship-based, the avoidance of losing one's reputation or being shamed is very important. As a result, high-context cultures are also referred to as shame-based cultures. Many Asian, Middle Eastern, and African countries are shame-based countries. Japan, for instance, is a strong example of a high-context culture. Japanese culture prizes uniformity of style, clothes, manners, speech, and formality to such an extent that there is even a Japanese proverb saying that "Nail sticking out of a piece of wood, it will be hammered in." ([miyon, 2008](#)) Group harmony is of utmost importance.

High-context cultures include:

- Japanese
- Indian
- Chinese
- Moroccan
- Latin American



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Low-Context Cultures

A low-context culture is one in which verbal communication is direct, with little concern or need for non-verbal cues in order for people to understand one another. Information about what to do is spelled out and made explicit through rules. It is easier for an outsider to know how to behave in certain situations.

In a low-context culture, the members have many connections but over a shorter period of time or for a specific reason. Relationships may be looser and activities more task- or activity- based. Sports teams or professional associations would be considered low-context cultures.



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**Low-Context Cultures (continued)**

Low-context cultures are also considered "rule-based" and "guilt based" cultures. Personal guilt serves as the moral compass in low-context cultures.

Low-context cultures include:

- American
- Canadian
- Australian
- German
- British

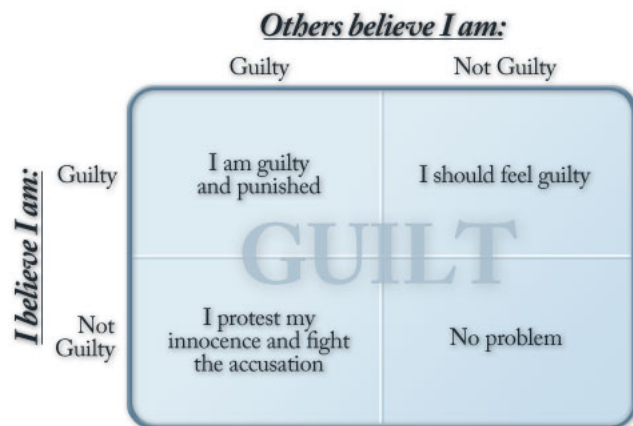


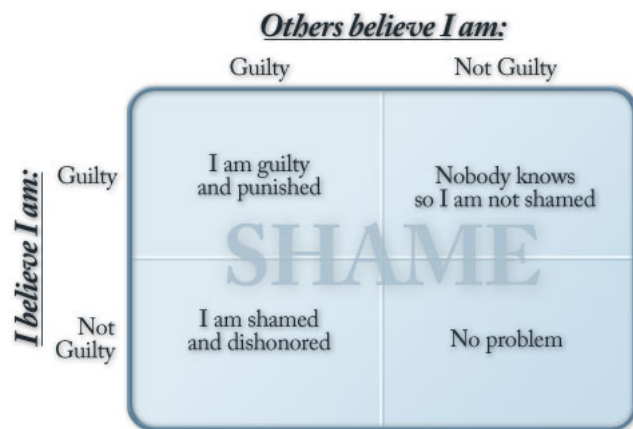
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**Guilt-Based Culture**[Audio Transcript](#)

**Shame-Based Culture**[Audio Transcript](#)

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Differences Between High- and Low-Context Cultures

The distinction between high-context and low-context cultures is useful in understanding broad distinctions between the way people may think and behave. However, no culture is simply high-context or low-context and any culture may contain elements of both.

Please click [here](#) to print and download this table.

Low-Context Culture	High-Context Culture
Individuals may respond rationally when presented plain and simple facts	"Facts" are what you see, experience, or WANT to see
Being objective is being truthful and fair	Honor is more important than facts. When confronted or threatened, simply reinterpret the facts to suit your needs
Logic can be persuasive	Relationships rather than logic can be persuasive
Rules should not be broken to provide special treatment to any individual	Rules are not absolute and should change based on relationships
Time is precious and limited	Time is in abundance. It is not necessary to do everything in the here and now.
Let's just get down to business	Introductions should not be hurried
Efficiency can be seen as being professional and competent	Efficiency can be seen as being rude and lacking manners

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**Knowledge Check 1**

A culture that is highly relationship based is a:

- A. [High-context culture](#)
- B. [Low-context culture](#)
- C. [Rule-based culture](#)
- D. [Guilt-based culture](#)



Select the correct response. Then, select Next to continue.

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**Knowledge Check 2**

In a low-context culture:

- A. [Avoiding shame is important](#)
- B. [People do not care about others' feelings](#)
- C. [Personal guilt serves as the moral compass](#)
- D. [Information about what to do is implicit](#)



Select the correct response. Then, select Next to continue.

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**Knowledge Check 3**

If I am not guilty but others believe I am guilty I protest my innocence in a:

- A. [Shame-based culture](#)
- B. [High-context culture](#)
- C. [Guilt-context culture](#)
- D. [Guilt-based culture](#)



Select the correct response. Then, select Next to continue.

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Lesson 2 Summary

In this lesson, you learned how to:

- State the difference between high-context and low-context cultures

"It is important to remember that every individual uses both high-context and low context communication; it is not simply a matter of choosing one over the other. Often, the types of relationships we have with others and our circumstances will dictate the extent to which we rely more on literal or implied meanings." ([mgjeffrey, 2010](#))



[Audio Transcript](#)

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